

July 12, 2021

Federal Aviation Administration
U.S. Department of Transportation
Docket Management System
1200 New Jersey Avenue, SE
West Building Ground Floor, W12-140
Washington, DC 20591-0001

Re: Exemption No. 15538 B, as amended, Docket No. FAA-2011-1001

Dear Sir or Madame:

Atlas Air Inc. requests an extension to Exemption No. 15538 B. This is an exemption from §121.689(a)(6) of Title 14, Code of Federal Regulations (14 CFR). Section 121.689 that prescribes, in pertinent part, that the flight release form supplemental operations must list the minimum fuel supply in gallons or pounds. We request that the extension allow Atlas Air Inc. to provide the minimum Fuel supply on the flight release in kilograms on domestic and international operations.

Our flight plans, aircraft fuel gauges and weight and balance system use kilograms as the unit of measure. By providing the minimum fuel supply on the release form in kilograms, all fuel data related to a flight will be in the same unit of measure, which will eliminate the possibility of the use of an improper fuel load. To do otherwise may conflict with our statutory duty as an air carrier to provide service with the highest possible degree of safety in the public interest.

Requiring fuel information in pounds when the aircraft fuel system, weight and balance system, and all fueling operations are done in kilograms introduces erroneous information into the system. This situation creates the risk of an aircraft taking off with incorrect fuel load. The listing of the minimum fuel supply on the flight release in a unit of measure that is consistent with the fuel system in the airplane decreases that risk and enhances safety. As the renewal of this exemption is not precedent setting, Atlas Air Inc. requests that publication in the Federal Register be waived.

Your consideration and approval of this request is appreciated.

Sincerely,

Michael A Giordano

Michael A. Giordano
Director Flight Operations Specification & Regulatory Administration
Atlas Air Inc.
580 Atlas Air Way
Erlanger, Kentucky 41018
786-265-5827
mike.giordano@atlasair.com